

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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ANDREW L. COLBORN,  
Plaintiff

NETFLIX, INC.,  
CHROME MEDIA, LLC, f/k/a  
SYNTHESIS FILMS, LLC,  
LAURA RICCIARDI, and  
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

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**PLAINTIFF'S UNOPPOSED EXPEDITED LOCAL RULE 7(h) MOTION TO  
ESTABLISH DEADLINE FOR RESPONSE TO MOTION TO DISMISS  
SECOND AMENDED COMPLAINT AS MAY 1, 2020**

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Plaintiff, by and through his undersigned counsel and pursuant to Local Rule of Civil Procedure 7(h), hereby respectfully moves the Court, to allow just under sixty (60) days for Plaintiff's response to the Defendants' Motion to Dismiss the Second Amended Complaint.

Plaintiff respectfully submits the following in support of this motion:

1. Based on a preliminary review of Defendants' motion, Defendants rely on several substantive arguments in support of their motion to dismiss the Second Amended Complaint. Defendants requested permission to file a brief that exceeded the normally-applicable page limits in order to develop these arguments, and the substantive portions of the brief amount to 48 pages in length. Plaintiff did not oppose Defendants' request with regard to page limits and will assess during the process of preparing his response whether a concomitant extension of page limits for the response will be necessary.

2. The supporting declaration that was filed with the Motion to Dismiss appends 33 attachments. Part of the process of responding to the Motion to Dismiss will entail reviewing the attachments as provided by Defendants to the Court and comparing them with the assertions made by Defendants regarding them in their brief. This is likely to be a time-consuming process. Moreover, that process will be in addition to the work necessary to review and respond to the substantive authority cited in the brief.
3. Plaintiff agreed to Defendants' request for 60 days to respond to the Second Amended Complaint. Plaintiff's request to prepare his response to the Motion to Dismiss the Second Amended Complaint requests just under 60 days, so that the deadline does not fall on a weekend.
4. Defendants' counsel have indicated that Defendants do not oppose Plaintiff's motion and request as set forth herein.

Dated this 5<sup>th</sup> day of March, 2020.

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By: /s/ George Burnett  
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